

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Case No.: 22-cv-01210-ENV-RLM

JOSHUA ADAMS,
Plaintiff,
vs.

SOUTH 6TH STUDIO INC. And
CGAA HOSPITALITY LLC
Defendants

AFFIRMATION OF MARIA-COSTANZA BARDUCCI IN SUPPORT OF ENTRY OF CLERK'S CERTIFICATE OF DEFAULT OF DEFENDANT, CGAA HOSPITALITY LLC

I, Maria-Costanza Barducci, Esq., as Counsel for Plaintiff in the above-styled action, hereby affirm under penalty of perjury as follows:

- 1) Barducci Law Firm, PLLC represents Plaintiff, **JOSHUA ADAMS** ("Plaintiff"), in the above captioned matter.
- 2) The within action was commenced for injunctive relief, pursuant to the Americans with Disabilities Act, 42 U.S.C., Section 12181 *et. seq.* (ADA) and 28 CFR Part 36 (ADAAG).
- 3) Plaintiff is a resident of the State of New York. Plaintiff was born with spina bifida and Hydrocephalus, and as a result is bound to ambulate in a wheelchair.
- 4) The within action was commenced on **March 4, 2022**.
- 5) The Court Issued Summons to all Defendants on **March 7, 2022**.
- 6) The Summons and Complaint were served on Defendant **CGAA HOSPITALITY LLC** by personally serving **AMY LESCH** at the Secretary of State on **April 22, 2022**.
- 7) Defendant **CGAA HOSPITALITY LLC**'s time to answer or otherwise respond to the complaint expired on **May 13, 2022**. To date, no Answer has been interposed on behalf of the Defendant **CGAA HOSPITALITY LLC**. The Defendant **CGAA HOSPITALITY LLC** is a

corporate entity, and is not an individual in the military service, nor is the Defendant **CGAA HOSPITALITY LLC** an infant or incompetent.

8) It is apparent that the Defendant **CGAA HOSPITALITY LLC** has no intention of voluntarily submitting to the jurisdiction of the Court.

WHEREFORE, Plaintiff requests that the Clerk of the Court enter a Notice of Default with respect to Defendant, **CGAA HOSPITALITY LLC** in the within matter.

Dated: June 17, 2022

s/Maria Costanza Barducci
Maria-Costanza Barducci (Bar No. 5070487)
Attorney for Plaintiff
BARDUCCI LAW FIRM, PLLC
5 West 19th Street, 10th Floor
New York, New York 10011
(212) 433-2554
MC@BarducciLaw.com